

CALIFORNIA CIVIL RIGHTS LAW GROUP

Lawrence A. Organ (SBN 175503)
Navruz Avloni (SBN 279556)
332 San Anselmo Avenue
San Anselmo, California 94960-2664
Telephone: (415) 453-4740
Facsimile: (415) 785-7352
larry@civilrightsca.com
navruz@civilrightsca.com

Attorneys for Plaintiffs,
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE
ORGAN IN SUPPORT OF PAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, NAVRUZ AVLONI, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have
6 personal knowledge of the facts stated herein and if called upon to testify, I could and would
7 competently testify thereto, except as to those matters that are stated upon information and belief.
8

9 2. Attached hereto and marked as Exhibit A are true and correct copies of
10 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped
11 CITISTAFF-000034 to CITISTAFF-000035. Defendant marked this document as "confidential"
12 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
13 Order.
14

15 3. Attached hereto and marked as Exhibit B is a true and correct copy of a document
16 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
17 000043. Defendant marked this document as "confidential" pursuant to the Protective Order, and
18 the document should therefore be sealed pursuant to this Order.
19

20 4. Attached hereto and marked as Exhibit C is a true and correct copy of a document
21 produced by Defendant Nextsource, Inc. in discovery and Bates-stamped NS000004. Defendant
22 marked this document as "confidential" pursuant to the Protective Order, and the document
23 should therefore be sealed pursuant to this Order.
24

25 5. Attached hereto and marked as Exhibit D is a true and correct copy of various
26 experts from the deposition of Owen Diaz. Defendant marked this document as "confidential"
27 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
28 Order.

1 6. Attached hereto and marked as Exhibit E is a true and correct copy of a document
2 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000511. Defendant
3 marked this document as "confidential" pursuant to the Protective Order, and the document
4 should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Exhibit F is a true and correct copy of a document
6 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000510. Defendant
7 marked this document as "confidential" pursuant to the Protective Order, and the document
8 should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Exhibit G are true and correct copies of
10 documents produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000667
11 to TESLA-0000671. Defendant marked this document as "confidential" pursuant to the
12 Protective Order, and the document should therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Exhibit H are true and correct copies of
14 documents produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000314
15 to TESLA-0000316. Defendant marked this document as "confidential" pursuant to the
16 Protective Order, and the document should therefore be sealed pursuant to this Order.

17 10. Attached hereto and marked as Exhibit I is a true and correct copy of various
18 excerpts from the deposition of Demetric Di-Az. Defendant marked this document as
19 "confidential" pursuant to the Protective Order, and the document should therefore be sealed
20 pursuant to this Order.

21 11. Attached hereto and marked as Exhibit J is a true and correct copy of various
22 excerpts from the deposition of Lamar Patterson. Defendant marked this document as
23 "confidential" pursuant to the Protective Order, and the document should therefore be sealed
24 pursuant to this Order.

1 12. Attached hereto and marked as Exhibit K is a true and correct copy of a document
2 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-000060. Defendant
3 marked this document as "confidential" pursuant to the Protective Order, and the document
4 should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Exhibit L is a true and correct copy of a document
6 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000626. Defendant
7 marked this document as "confidential" pursuant to the Protective Order, and the document
8 should therefore be sealed pursuant to this Order.

9 14. Attached hereto and marked as Exhibit M are true and correct copies of
10 documents produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000138
11 through NS000139. Defendant marked this document as "confidential" pursuant to the Protective
12 Order, and the document should therefore be sealed pursuant to this Order.

13 15. Attached hereto and marked as Exhibit N are true and correct copies of
14 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped
15 CITISTAFF-0000050 through CITISTAFF-0000055. Defendant marked this document as
16 "confidential" pursuant to the Protective Order, and the document should therefore be sealed
17 pursuant to this Order.

18 16. Attached hereto and marked as Exhibit O are true and correct copies of
19 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped
20 CITISTAFF-0000004 through CITISTAFF-0000005. Defendant marked this document as
21 "confidential" pursuant to the Protective Order, and the document should therefore be sealed
22 pursuant to this Order.

23 17. Attached hereto and marked as Exhibit P are true and correct copies of documents
24 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000038 through
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1 NS000045. Defendant marked this document as "confidential" pursuant to the Protective Order,
2 and the document should therefore be sealed pursuant to this Order.

3 18. Attached hereto and marked as Exhibit Q are true and correct copies of
4 documents produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000095
5 through NS000100. Defendant marked this document as "confidential" pursuant to the Protective
6 Order, and the document should therefore be sealed pursuant to this Order.
7

8 19. Attached hereto and marked as Exhibit R is a true and correct copy of a document
9 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000014. Defendant
10 marked this document as "confidential" pursuant to the Protective Order, and the document
11 should therefore be sealed pursuant to this Order.
12

13 20. Attached hereto and marked as Exhibit S are true and correct copies of documents
14 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
15 0000009 through CITISTAFF-0000010. Defendant marked this document as "confidential"
16 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
17 Order.
18

19 21. Attached hereto and marked as Exhibit T are true and correct copies of documents
20 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000321 through
21 TESLA-0000323. Defendant marked this document as "confidential" pursuant to the Protective
22 Order, and the document should therefore be sealed pursuant to this Order.
23

24 22. Attached hereto and marked as Exhibit U are true and correct copies of
25 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped
26 TESLA-0000001 through TESLA-0000003. Defendant marked this document as "confidential"
27 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
28 Order.

23. Attached hereto and marked as Exhibit V are true and correct copies of documents produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000175 through NS000178. Defendant marked this document as "confidential" pursuant to the Protective Order, and the document should therefore be sealed pursuant to this Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 2, 2019 in San Anselmo, California.

DATED: October 2, 2019

By: /s Lawrence Organ
Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ